

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

MICHAEL T. FLYNN,

Defendant.

Criminal No.:

Violation: 18 U.S.C. § 1001 (False
Statements)

INFORMATION

The Special Counsel informs the Court:

COUNT ONE

(False Statements)

Case: 1:17-cr-00232
Assigned To : Judge Contreras, Rudolph
Assign. Date : 11/30/2017
Description: INFORMATION (A)

On or about January 24, 2017, defendant MICHAEL T. FLYNN did willfully and knowingly make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit, the defendant falsely stated and represented to agents of the Federal Bureau of Investigation, in Washington, D.C., that:

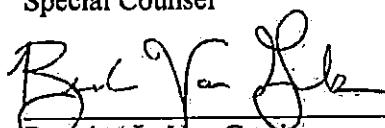
- (i) On or about December 29, 2016, FLYNN did not ask the Government of Russia's Ambassador to the United States ("Russian Ambassador") to refrain from escalating the situation in response to sanctions that the United States had imposed against Russia that same day; and FLYNN did not recall the Russian Ambassador subsequently telling him that Russia had chosen to moderate its response to those sanctions as a result of his request; and
- (ii) On or about December 22, 2016, FLYNN did not ask the Russian Ambassador to delay the vote on or defeat a pending United Nations Security Council resolution; and

that the Russian Ambassador subsequently never described to FLYNN Russia's response to his request.

(Title 18, United States Code, Section 1001(a)(2))

ROBERT S. MUELLER, III
Special Counsel

By:



Brandon L. Van Grack
Zainab N. Ahmad
Senior Assistant Special Counsels
The Special Counsel's Office